



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

November 8, 2022

REPLY TO THE ATTENTION OF:

SE-5J

MEMORANDUM

SUBJECT: Request for Approval of a Time-Critical Removal Action at the Vincent's Marathon Site, 6674 N. Meridian Road, Edenville, Midland County, Michigan 48628 (Site ID #C5WG)

FROM: Brian Kelly, On-Scene Coordinator
Emergency Response Branch 1
Emergency Response Section 2

THRU: Jason H. El-Zein, Manager
Emergency Response Branch 1

TO: Douglas Ballotti, Director
Superfund & Emergency Management Division

I. PURPOSE

This Action Memorandum is to request and document your approval to expend up to \$675,466 to conduct a time-critical removal action to remove 55-gallon drums, bulk containers, and small containers of hazardous substances at the Vincent's Marathon Site (Site).

The 0.64-acre Site is a former gas station and auto repair shop at 6674 M-30, North Meridian Road, Edenville, Midland County, Michigan 48628 (Appendix A, Figure 1). The Site is in a residential area and contains one building that had been used as an auto service station. The building also contained a restaurant and a garage. Historic operations included cleaning car parts, drum and container storage, and fuel services. The property was flooded during the March 2020 flooding caused by the Edenville Dam collapse and never reopened. The property is currently vacant and unsecured (AR#9). Midland County acquired the property through tax reversion (AR#7).

The Site is bounded on the north, east, and south by residential areas. The closest residence is about 50 feet north of the Site. The Site is bounded to the west by Meridian Road, with a residential area extending to the Tittabawassee River beyond.

Imminent and substantial threats to human health and the environment at the Site include (AR#9):

- Unsecured building

- Trespassing and salvaging of materials
- EPA sampling shows Benzene, Perchloroethylene (PCE), Chlordane, and Heptachlor in drums and containers.

Benzene, PCE, Chlordane, and Heptachlor are defined as Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) hazardous substances by 40 C.F.R. § 302.4.

The proposed removal of hazardous substances would be taken pursuant to Section 104(a)(1) of CERCLA, 42 U.S.C. § 9604(a)(1), and Section 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP).

II. SITE CONDITIONS AND BACKGROUND

Name: Vincent's Marathon Site
 Superfund Site ID: C5WG
 CERCLIS ID: MIN000521836
 Site Location: 6674 N. Meridian Road, Edenville, Midland County, Michigan 49913
 Lat/Long: 43.804200, -84.385686
 Potentially Responsible Parties (PRPs): The former owner Danny Vincent is deceased
 NPL Status: Not on the NPL
 Project Schedule: 40 working days
 Category: CERCLA Time-Critical Removal

A. Site Description

1. Removal site evaluation

In May 2022, personnel from the Remediation and Redevelopment Division of the Michigan Department of Environment, Great Lakes, and Energy (EGLE) inspected the Site. In an email dated May 27, 2022, EGLE requested assistance from EPA to address the risks posed by the Site. (AR#7)

On June 17, 2022, EPA conducted a Removal Site Evaluation (AR#9) that documented the unsecured gas station, drums, and hazardous waste onsite. The following materials and conditions at former auto service station were identified:

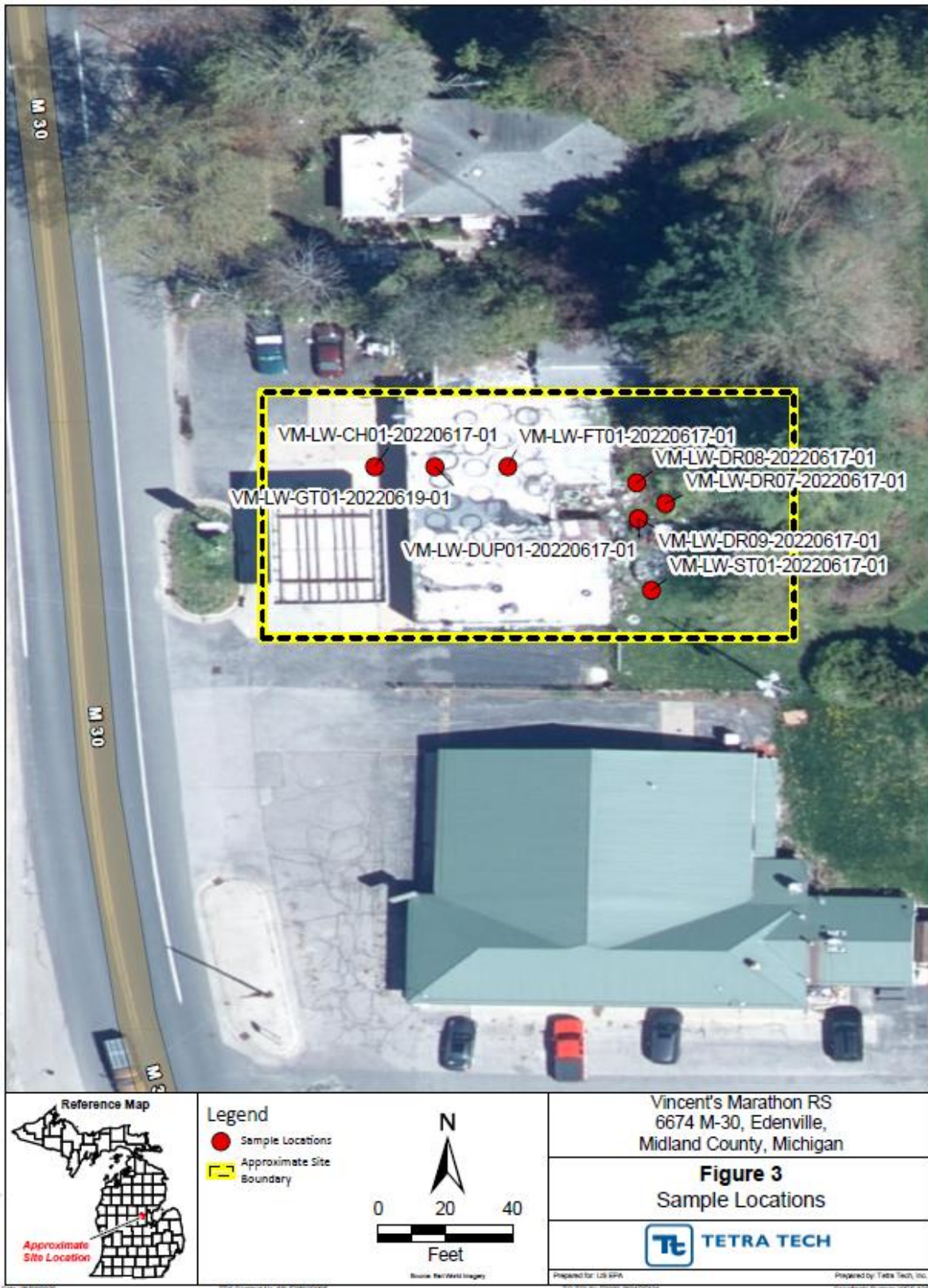
- 16 55-gallon drums
- 50 5-gallon buckets
- Stain surfaces near the drums
- A parts washer vat
- hundreds of small containers

Some labeled containers appeared to have been repurposed for waste storage based on the presence of secondary labels or handwritten labels.

Samples collected by EPA confirmed the presence of hazardous waste at the vacant, unsecured Site (see table below (AR#8)). Waste identified as hazardous includes 55-gallon drums, cleaning products, and pesticides.

Summary of EPA Sample Results				
Sample Number	Benzene, PCE, Chlordane, or Heptachlor	Sample Result	Hazardous Waste Criteria	Notes
VM-LW-DR07-20220617-01	Naphthalene Toluene Xylene	770 mg/kg 170 mg/kg 1,600 mg/kg		Hazardous Substance
VM-LW-DR08-20220617-01	Benzene PCE	217.5 mg/L 36 mg/L Flash 99°F	Benzene 0.5 mg/L PCE 0.5 mg/L Flash >140°F	Hazardous Waste
VM-LW-DR09-20220617-01	Benzene	225 mg/L Flash 99°F	Benzene 0.5 mg/L Flash >140°F	Hazardous Waste
VM-LW-DUP01-20220617-01	Benzene	210 mg/L Flash 85°F	Benzene 0.5 mg/L Flash >140°F	Hazardous Waste
VM-LW-CH01-20220617-01	Chlordane	238,500 mg/L	Chlordane 0.03 mg/L	Hazardous Waste
VM-LW-ST01-20220617-01	NA	NA		Septic Field – no detections above criteria
VM-LW-FT01-20220617-01	NA	NA		floor trench – no detections above criteria
VM-LW-GT01-20220619-01				Sample was damaged at the laboratory

EPA Sample Locations



2. Physical location

The Site is located at 6674 N. Meridian Road, Edenville, Midland County, Michigan 49913 (Latitude/Longitude: 43.804200, -84.385686) on the northern end of M-30 near the Tittabawassee River and consists of a vacant gas station. Located immediately around the Site are residential homes and a convenience store.

3. Site characteristics

The building at the Site is located about 500 feet south of the Edenville Dam, which broke in March 2020, resulting in significant flooding at the Site. The garage doors are unsecured, and the drums are out in the open behind the building. Unauthorized access to the building could lead to releases or affect the trespassers via inhalation or skin contact. Electricity to the building has been shut off, allowing freeze and thaw cycles to occur inside the building. Continued freeze-thaw weathering may cause the drums to rupture. The drums also contain flammable hazardous wastes, which could release toxic fumes during a fire.

An Environmental Justice (EJ) analysis for the Site was conducted. Screening of the surrounding area used Region 5's EJ Screen Tool [which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)]. Region 5 has reviewed environmental and demographic data for the area surrounding the Site and has determined there is a potential for EJ concerns at this location.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

EPA collected seven container samples. Three were determined to be hazardous waste for Benzene, PCE, and/or characteristically hazardous for flammability. The containers of hazardous wastes are abandoned at a vacant property subject to trespassing (AR#8 & #9). Unless the hazardous wastes are removed from the Site, trespassing, fire, or weather conditions may cause the hazardous wastes to migrate beyond the site boundaries.

5. NPL status

The Site is not listed on the NPL and has not been proposed for listing on the NPL. The Site has not received a Hazard Ranking Score and is not being referred to the NPL Site Assessment Program

6. Maps, pictures, and other graphic representations

Attachments 3 and 4 show the location and photographs of the Site.

B. Other Actions to Date

1. Previous actions

Michigan EGLE initially assessed the Site and has referred it to EPA (AR#7).

2. Current actions

None

State and Local Authorities' Roles

1. State and local actions to date

EGLE assessed the Site and has requested EPA assistance in the cleanup of the Site (AR#7).

2. Potential for continued state/local response

Given the exigency of the situation, neither the state nor local governments have the resources to conduct a removal action at the Site.

III. THREATS TO PUBLIC HEALTH OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the Site present a substantial threat to the public health or welfare, and the environment, and meet the criteria for a time-critical removal action, pursuant to the NCP at 40 C.F.R. § 300.415(b)(1), based on the following factors in 40 C.F.R. § 300.415(b)(2).

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.

EPA's site assessment documented hazardous wastes in 55-gallon drums at the Site. The drums are located at the Site, which is near the Edenville Dam and Tittabawassee River. There are homes and a convenience store immediately surrounding the Site. Trespassing, fire, or weather may cause the hazardous wastes to migrate beyond the boundaries of the Site.

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release.

EPA identified 16 55-gallon drums, 1 parts vat, an underground vault, and hundreds of small containers of waste at the Site. Waste samples collected from the drums contained CERCLA hazardous substances, including characteristically hazardous waste, Naphthalene, Toluene, Xylene, Benzene, PCE, and Chlordane (AR#9).

According to the Agency for Toxic Substances and Disease Registry, hazardous substances such as Naphthalene may damage or destroy red blood cells and causes cancer in animals, Toluene may affect the nervous system, Xylene may cause irritation of the skin, eyes, nose, and throat and difficulty in breathing, Benzene can cause drowsiness, dizziness, and unconsciousness, PCE

can cause dizziness headaches, sleepiness, incoordination, confusion, nausea, unconsciousness, and even death, and Chlordane can affect the nervous system and cause headaches, dizziness and tremors and may damage the liver (AR#1-6).

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

Some of the drums at the Site are inside the unheated building, and some are outside, exposed to the elements. Midland County averages 34 inches of rain (national average 38.1) and 49 inches of snow (national average 27.8) per year. Exposure of the waste to freezing and thawing may lead the drums to rupture and release hazardous waste into the environment. Once released, rain and snow melt may cause the hazardous wastes to migrate from the Site.

The availability of other appropriate federal or state response mechanisms to respond to the release.

No other federal or state response mechanism is available to respond in a timely manner, given the exigencies of the situation. The State of Michigan has requested EPA assistance (AR#7)

IV. ENDANGERMENT DETERMINATION

Given the conditions at the Site, the nature of the known and suspected hazardous substances on-site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances on the Site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. Removal activities on Site will include:

- a) Develop and implement a Site Health and Safety Plan to protect workers and the public during the cleanup, including but not limited to installing and maintaining fencing and warning signs, restricting access, and conducting air monitoring, as needed;
- b) Develop and implement a Removal Work Plan to:
 - Remove and dispose of debris to facilitate accessing waste containers;

- Remove and dispose of waste containers, including drums, bulk containers, and small containers of waste;
 - Remove waste from used oil pit; and
 - Backfill open floor vaults for safety purposes, if needed.
- c) Ensure that any hazardous substances, pollutants or contaminants sent off-site are treated, stored, and/or disposed of in accordance with the EPA Off-Site Rule, 40 C.F.R. § 300.440.

The removal action will be conducted in a manner not inconsistent with the NCP. The On-Scene Coordinator (OSC) has initiated planning for provisions of post-removal site control consistent with the provisions of 40 C.F.R. § 300.415(l). It is expected that the removal of the waste containers will eliminate the need for post-removal site control.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants, or contaminants at the Site, which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

2. Contribution to remedial performance

The proposed removal action at the Site will not impede future actions based on available information.

3. Engineering Evaluation/Cost Analysis (EE/CA)

Not Applicable

4. Applicable or relevant and appropriate requirements (ARARs)

All applicable, relevant, and appropriate requirements (ARARs) of Federal and State law will be complied with to the extent practicable, considering the exigencies of the circumstances. On September 28, 2022, EPA sent a letter to Jeremy Boothroyd of EGLE to request State of Michigan ARARs (AR#11). EGLE responded on September 28, 2022, stating they are “unaware of any other potential ARAR.” (AR#10)

Federal ARARs may include

Chemical-Specific

None identified

Location- Specific

None identified

Action-Specific

Standards Applicable to Generation of Hazardous Waste, 40 CFR. Part 262

Standards Applicable to Transporters of Hazardous Waste, 40 CFR. Part 263

Standards Applicable for Waste Disposal, 40 CFR 300.440

5. Project Schedule

The removal should be completed within 40 working days of initiating the work.

Estimated Costs

The detailed cleanup contractor costs are presented in Attachment 1. Costs are projected as follows:

Regional Removal Allowance Costs

Cleanup Contractor Costs (With 15% contingency)	\$519,989
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Other Extramural Cost Not Funded from the Regional Allowance:

START	\$42,900
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Subtotal, Extramural Subtotal	<u>\$562,889</u>
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Extramural Costs Contingency (20% of Subtotal)	\$112,578
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TOTAL, Removal Action Project Ceiling	\$675,466
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VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Given the conditions at the Site, the nature of the known and suspected hazardous substances on the Site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.¹

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$1,236,400.

$$\begin{array}{r} (\$675,466 + \$30,000^1) + (75.26\%^2 \times \$705,466) = \$1,236,400 \\ \$705,466 \qquad \qquad \qquad \$530,934 \end{array}$$

¹ Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

¹Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

² Direct Costs include direct extramural costs and direct intramural costs.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Vincent's Marathon Site in Edenville, Midland County, Michigan, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based on the administrative record for the Site (Attachment 1). Conditions at the Site meet the NCP criteria at 40 C.F.R. § 300.415(b) for a removal action, and I recommend your approval of the removal action proposed in this Action Memorandum. The total project ceiling will be \$675,466. Of this, \$632,566 may be used for cleanup contractor costs.

You may indicate your approval by signing below.

APPROVE: X Douglas Ballotti DATE: November 8, 2022
Douglas Ballotti, Director
Superfund & Emergency Management Division
Signed by: DOUGLAS BALLOTTI

DISAPPROVE: X DATE: _____
Douglas Ballotti, Director
Superfund & Emergency Management Division

Enforcement Addendum

Attachments:

1. Administrative Record Index
2. Region 5 EJ Analysis
3. Project Location and Site Layout Maps
4. Photographs
5. Independent Government Cost Estimate
6. Detailed Cleanup Contractor Costs

cc: Steve Ridenour, EPA HQ (Ridenour.Steve@epa.gov)
Brian Schlieger, EPA HQ (Schlieger.Brian@epa.gov)
J. Nelson, U.S. DOI, w/o Enf. Addendum, (Lindy_Nelson@ios.doi.gov)
Liesl Clark, Director, EGLE, w/o Enf. Addendum (ClarkL20@michigan.gov)
Dana Nessel, Michigan AG, w/o Enf. Addendum (miag@michigan.gov)
Joe Walczak, EGLE, w/o Enf. Addendum (walczakj@michigan.gov)
Amy Keranen, EGLE, w/o Enf. Addendum (KERANENA@michigan.gov)

BCC PAGE HAS BEEN REDACTED

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

ENFORCEMENT ADDENDUM

HAS BEEN REDACTED

TWO PAGES

ENFORCEMENT CONFIDENTIAL

NOT SUBJECT TO DISCOVERY FOIA

EXEMPT

NOT RELEVANT TO SELECTION

OF REMOVAL ACTION

**ATTACHMENT 1
ADMINISTRATIVE RECORD
FOR THE
VINCENT'S MARATHON SITE
EDENVILLE, MIDLAND COUNTY, MICHIGAN**

**ORIGINAL
SEPTEMBER, 2022
SEMS ID:**

<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	977583	8/1/05	ATDSR	General Public	Publication - Report - Re: Naphthalene CAS # 91-20-3	2
2	977587	8/1/07	ATDSR	General Public	Publication - Report - Re: Xylene CAS # 1330-20-7	2
3	977582	8/1/07	ATDSR	General Public	Publication - Report - Re: Benzene - ToxFAQs CAS # 71-43-2	2
4	977586	6/1/17	ATDSR	General Public	Publication - Report - Re: Toluene - ToxFAQs	2
5	977584	2/1/18	ATDSR	General Public	Publication - Report - Re: Chlordane - ToxFAQs	2
6	977585	6/1/19	ATDSR	General Public	Publication - Report - Re: Trichloroethylene - ToxFAQs CAS # 79-01-6	2
7	977578	5/27/22	Mankowski, M. U.S. EPA	Miller, M. Confirmation of the Request for Assistance at the Vincent's Marathon Site	Correspondence - Re:	2
8	977581	7/14/22	ALS Environmental	Tetra Tech	Report - Re: Sample Results at the Vincent's Marathon Site	101
9	977577	8/29/22	Kish, H., Tetra Tech	Kelly, B., U.S. EPA	Report - Re: Site Assessment Report at the Vincent's Marathon Site (Revision 0)	187

10	977579	9/28/22	Boothroyd, J. EGLE	Kelly, B., U.S. EPA	Correspondence - Re: (ARAR's) at the Vincent's Marathon Site	1
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<u>NO.</u>	<u>SEMS ID</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
11	977580	9/28/22	Kelly, B., U. S. EPA	Boothroyd, J. EGLE	Correspondence - Re: Applicable or Relevant and Appropriate Requirements (ARAR's) at the Vincent's Marathon Site	3
12	*****	*****	*****	*****	Action Memorandum (<i>Pending</i>)	*****



ATTACHMENT 2

EJ ANALYSIS



EJScreen Report (Version 2.0)



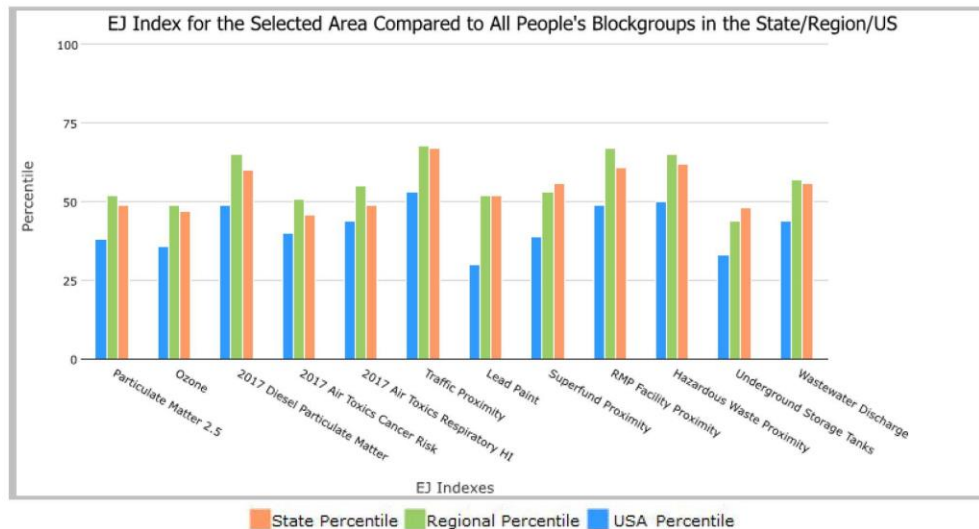
1 mile Ring Centered at 43.804255,-84.385541, MICHIGAN, EPA Region 5

Approximate Population: 287

Input Area (sq. miles): 3.14

EJ

Selected Variables	State Percentile	EPA Region Percentile	USA Percentile
Environmental Justice Indexes			
EJ Index for Particulate Matter 2.5	49	52	38
EJ Index for Ozone	47	49	36
EJ Index for 2017 Diesel Particulate Matter*	60	65	49
EJ Index for 2017 Air Toxics Cancer Risk*	46	51	40
EJ Index for 2017 Air Toxics Respiratory HI*	49	55	44
EJ Index for Traffic Proximity	67	68	53
EJ Index for Lead Paint	52	52	30
EJ Index for Superfund Proximity	56	53	39
EJ Index for RMP Facility Proximity	61	67	49
EJ Index for Hazardous Waste Proximity	62	65	50
EJ Index for Underground Storage Tanks	48	44	33
EJ Index for Wastewater Discharge	56	57	44



This report shows the values for environmental and demographic indicators and EJSCREEN indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJSCREEN documentation for discussion of these issues before using reports.

September 28, 2022

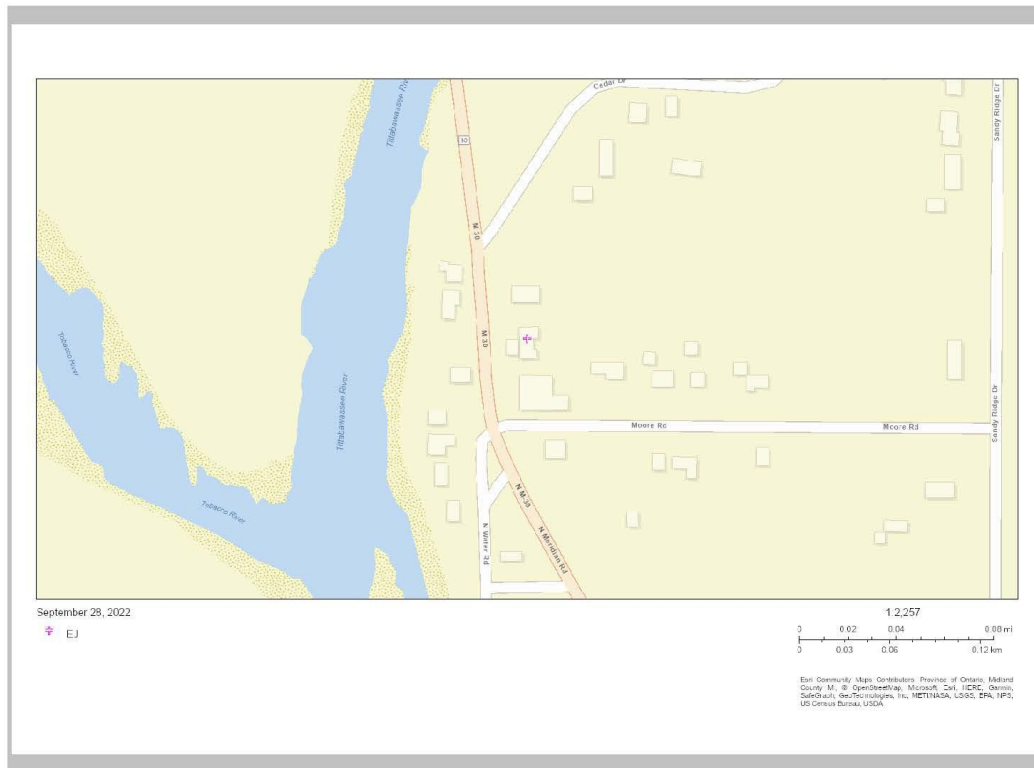
1/3

1 mile Ring Centered at 43.804255,-84.385541, MICHIGAN, EPA Region 5

Approximate Population: 287

Input Area (sq. miles): 3.14

EJ



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0



EJScreen Report (Version 2.0)



1 mile Ring Centered at 43.804255,-84.385541, MICHIGAN, EPA Region 5

Approximate Population: 287

Input Area (sq. miles): 3.14

EJ

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
Pollution and Sources							
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	7.41	8.75	10	8.96	9	8.74	19
Ozone (ppb)	41	43.8	8	43.5	15	42.6	38
2017 Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.0671	0.209	7	0.279	<50th	0.295	<50th
2017 Air Toxics Cancer Risk* (lifetime risk per million)	20	23	70	24	60-70th	29	<50th
2017 Air Toxics Respiratory HI*	0.2	0.25	50	0.3	<50th	0.36	<50th
Traffic Proximity (daily traffic count/distance to road)	3.5	830	5	610	4	710	4
Lead Paint (% Pre-1960 Housing)	0.16	0.37	30	0.37	31	0.28	48
Superfund Proximity (site count/km distance)	0.033	0.15	13	0.13	24	0.13	29
RMP Facility Proximity (facility count/km distance)	0.069	0.53	11	0.83	5	0.75	8
Hazardous Waste Proximity (facility count/km distance)	0.062	1.1	11	1.8	8	2.2	9
Underground Storage Tanks (count/km ²)	0.52	7.3	31	4.8	36	3.9	36
Wastewater Discharge (toxicity-weighted concentration/m distance)	2.9E-05	0.41	23	9	21	12	23
Socioeconomic Indicators							
Demographic Index	16%	28%	33	28%	35	36%	21
People of Color	2%	25%	5	26%	7	40%	3
Low Income	30%	32%	53	29%	58	31%	53
Unemployment Rate	4%	6%	42	5%	49	5%	44
Linguistically Isolated	0%	2%	65	2%	59	5%	45
Less Than High School Education	14%	9%	80	10%	78	12%	68
Under Age 5	4%	6%	33	6%	30	6%	30
Over Age 64	23%	17%	79	16%	81	16%	82

* Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's 2017 Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

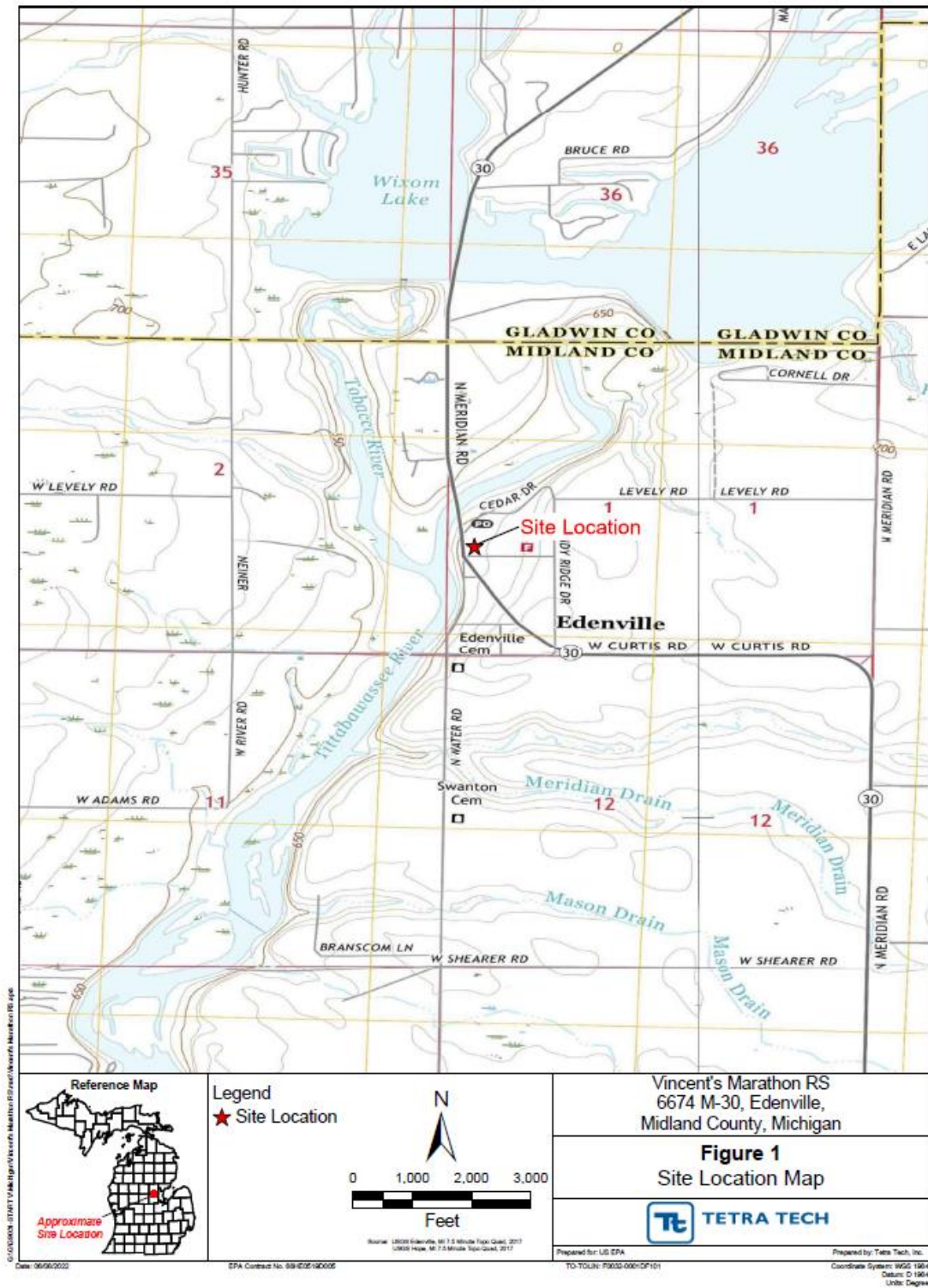
For additional information, see: www.epa.gov/environmentaljustice

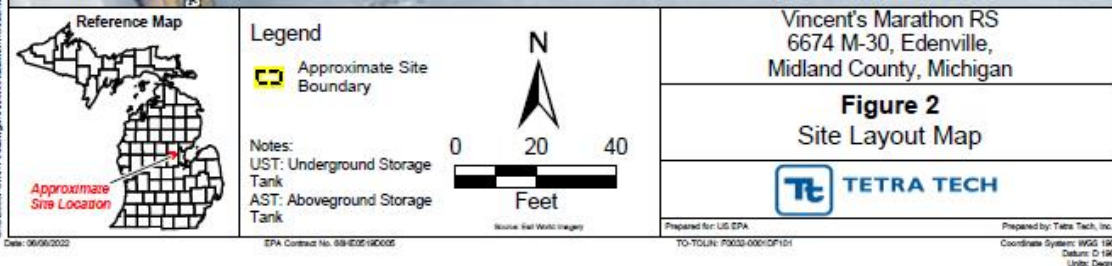
EJScreen is a screening tool for pre-decisional use only. It can help identify areas that may warrant additional consideration, analysis, or outreach. It does not provide a basis for decision-making, but it may help identify potential areas of EJ concern. Users should keep in mind that screening tools are subject to substantial uncertainty in their demographic and environmental data, particularly when looking at small geographic areas. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. This screening tool does not provide data on every environmental impact and demographic factor that may be relevant to a particular location. EJScreen outputs should be supplemented with additional information and local knowledge before taking any action to address potential EJ concerns.

September 28, 2022

3/3

ATTACHMENT 3
PROJECT LOCATION AND SITE LAYOUT MAPS





ATTACHMENT 4
PHOTOGRAPHS



ATTACHMENT 5

**INDEPENDENT GOVERNMENT COST
ESTIMATE HAS BEEN REDACTED**

THREE PAGES

**NOT RELEVANT TO SELECTION
OF REMOVAL ACTION**

ATTACHMENT 6

**DETAILED CLEANUP
CONTRACTOR COSTS
HAS BEEN REDACTED
ONE PAGE
NOT RELEVANT TO
SELECTION OF REMOVAL
ACTION**